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March 22, 2023

VIA ECF and Email

The Honorable Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
Torres\_NYSDChambers@nysd.uscourts.gov

Re: *Syracuse Mountains Corp. v. Bolivarian Republic of Venezuela*,  
Case No. 1:21-cv-02678-AT

Dear Judge Torres:

We write on behalf of Plaintiff Syracuse Mountains Corporation (“Syracuse”).

On April 12, 2022, the Clerk of the Court noted the default of Defendant Bolivarian Republic of Venezuela (“Venezuela”). *See* Dkt. 38. The following month, the Court waived the procedures in Attachment A to the Court’s Individual Practices and indicated that it would issue an order with respect to Plaintiff’s motion for default judgment “in due course.” Dkt. 44.

Because Venezuela has received notice of this lawsuit and has elected not to appear or answer, we write to request that the Court proceed to enter default judgment upon a finding that Syracuse has established its right to relief by evidence satisfactory to the Court.

Respectfully submitted,

/s/ Michael DeBernardis  
Michael DeBernardis